

JENNY L. FOLEY, Ph.D., ESQ.
Nevada Bar No. 9017
E-mail: jfoley@hkm.com
HKM EMPLOYMENT ATTORNEYS LLP
101 Convention Center Drive, Suite 600
Las Vegas, Nevada 89109
Tel: (702) 805-8340
Fax: (702) 805-8340
Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SANDRA M. MEZA-PEREZ an Individual,

Plaintiff,
vs.

CASE NO.: 2:19-cv-00373-APG-EJY

SBARRO LLC dba SBARRO PIZZA, a
foreign limited liability company, SBARRO
INC., dba SBARRO PIZZA a foreign
corporation, ZACHARY CEBALLES, an
individual, EFRAIN HERNANDEZ, an
individual, JESUS ALATORRE, an
individual,

**SPECIAL VERDICT FORM
(PROPOSED)**

Defendants.

SPECIAL VERDICT FORM

You may read the entire verdict form before answering the questions. You must answer all of the questions, unless otherwise indicated. Answer the questions in numerical order. Follow all directions. After you have answered all required questions, the foreperson shall sign and date the Special Verdict Form and contact the bailiff.

1. Has plaintiff proved, by a preponderance of the evidence, that she was subjected to quid pro quo sexual harassment through the actions of Zachary Ceballes and/or Sbarro Defendant's other employees?

_____ YES _____ NO

1 If you answer yes to this question, proceed to Question 2. If you answer no, proceed to
2 Question 4.

3
4 2. Has plaintiff proved by a preponderance of the evidence that, after plaintiff
5 reported that she was subjected to quid pro quo sexual harassment, the Sbarro Defendants failed
6 to take reasonable remedial steps to end the sexually hostile work environment and to
discourage possible future harassment by Sbarro Defendants' employees?

7
8 _____ YES _____ NO

9
10 If you answer yes to this question, proceed to Question 3. If you answer no, proceed to
11 Question 4.

12 3. What sum of money, if any, do you unanimously agree will fairly and reasonably
13 compensate plaintiff for the injuries she proved she suffered as a result of the quid pro quo
14 sexual harassment you found?

15 \$ _____

16
17 Go to Question 4.

18
19 4. Has plaintiff proved, by a preponderance of the evidence, that she was subjected
20 to a sexually hostile work environment through the actions of Zachary Ceballes and/or Sbarro
Defendant's other employees?

21
22 _____ YES _____ NO

1 If you answer yes to this question, proceed to Question 5. If you answer no, proceed to
2 Question 7.

3
4 5. Has plaintiff proved by a preponderance of the evidence that, after plaintiff
5 reported a sexually hostile work environment, the Sbarro Defendants failed to take reasonable
6 remedial steps to end the sexually hostile work environment and to discourage possible future
harassment by Sbarro Defendants' employees?

7
8 _____ YES _____ NO

9
10 If you answer yes to this question, proceed to Question 6. If you answer no, proceed to
11 Question 7.

12 6. What sum of money, if any, do you unanimously agree will fairly and reasonably
13 compensate plaintiff for the injuries she proved she suffered as a result of the sexually hostile
14 work environment you found?

15 \$ _____

16
17 Go to Question 7.

18
19 7. Has plaintiff proved by a preponderance of the evidence that, after plaintiff
20 reported quid pro quo sexual harassment and/or a sexually hostile work environment, she was
21 subjected to retaliation through the actions of Zachary Ceballes and/or Sbarro Defendant's other
employees?

22
23 _____ YES _____ NO

1 If you answer yes to this question, proceed to Question 8. If you answer no, proceed to
2 Question 9.

3
4 8. What sum of money, if any, do you unanimously agree will fairly and reasonably
5 compensate plaintiff for the injuries she proved she suffered as a result of the retaliation you
6 found?

7 \$ _____

8
9 Go to Question 9.

10 9. Has plaintiff proved, by a preponderance of the evidence, that she was subjected
11 to an assault(s) through the actions of Zachary Ceballes?

12
13 _____ YES _____ NO

14 If you answer yes to this question, proceed to Question 10. If you answer no, proceed
15 to Question 11.

16
17 10. What sum of money, if any, do you unanimously agree will fairly and reasonably
18 compensate plaintiff for the injuries she proved she suffered as a result of the assault(s) you
19 found?

20 \$ _____

21
22 Go to Question 11.

1 11. Has plaintiff proved, by a preponderance of the evidence, that she was subjected
2 to a battery(ies) through the actions of Zachary Ceballes?

3
4 _____ YES _____ NO

5 If you answer yes to this question, proceed to Question 12. If you answer no, proceed
6 to Question 13.

7
8 12. What sum of money, if any, do you unanimously agree will fairly and reasonably
9 compensate plaintiff for the injuries she proved she suffered as a result of the battery(ies) you
10 found?

11 \$ _____

12
13 Go to Question 13.

14 13. Has plaintiff proved, by a preponderance of the evidence, that she was subjected
15 to false imprisonment(s) through the actions of Zachary Ceballes?

16
17 _____ YES _____ NO

18
19 If you answer yes to this question, proceed to Question 14. If you answer no, proceed
20 to Question 15.

21 14. What sum of money, if any, do you unanimously agree will fairly and reasonably
22 compensate plaintiff for the injuries she proved she suffered as a result of the false
23 imprisonment(s) you found?

1 \$ _____

2
3 Go to Question 15.

4 15. Has plaintiff proved, by a preponderance of the evidence, that she was subjected
5 to intentional infliction of emotional distress through the actions of Zachary Ceballes?

6
7 _____ YES _____ NO

8
9 If you answer yes to this question, proceed to Question 16. If you answer no, you have
10 completed this verdict form.

11 16. What sum of money, if any, do you unanimously agree will fairly and reasonably
12 compensate plaintiff for the injuries she proved she suffered as a result of the intentional
13 infliction of emotional distress you found?

14 \$ _____

15
16 You have completed the verdict form. Please sign and date below.

17 Dated this ____ of September, 2022.

18
19 _____
20 FOREPERSON, CASE NO.: 2:19-cv-00373-APG-EJY